

## ***Failures of Tower Lighting and Monitoring Systems Not Anticipated***

### ***PCIA Commends FCC for its Thoroughness and Diligence***

The Personal Communications Industry Association (PCIA) does not believe that the turn of the millennium will result in light outages for towers subject to FCC's marking and lighting rules or the failure of monitoring systems used to detect light outages. To confirm this belief, PCIA surveyed its members to make sure they have adequately assessed the possibilities of towers not being lit or automatic monitoring systems not being capable of reporting lighting failures. PCIA members indicated that they've determined the likelihood that tower lights would go out or monitoring systems would fail due to Y2K-related problems are negligible. At the same time, PCIA believes the question is well worth asking and commends the FCC for making sure that potential Y2K problems in this area are not overlooked.

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Tower lighting and monitoring systems are relatively low tech in terms of their reliance on computer systems, embedded chips, and software programs that utilize data and time information. For instance, many lighting system uses photocell sensors to determine when a tower's lighting configuration should be operating on either daytime or nighttime status and do not use the date and time function. Similarly, while remote monitoring systems might be somewhat more susceptible to Y2K problems because they tend to generally operate across a greater distance and a larger number of other networks, PCIA members have indicated that breakdowns of monitoring systems are also highly unlikely. While tower managers and wireless carriers have relied substantially on the assurances of their suppliers of lighting and monitoring equipment to make these determinations, they are consistent with the feedback that PCIA has also received from manufacturers and suppliers of lighting and monitoring systems.

Another potential cause for tower light failures could be when Y2K problems indirectly cause tower lights to go out as a result of area-wide power blackouts. For instance, in the event the power to an area is disrupted, unless there is backup power at the site, the lights will go out and stay out until electrical service is restored. Most tower sites do not have backup power generators.

PCIA members also indicate that area-wide power outages are not likely to disable remote monitoring systems as long as the telephone service to the site is not also disrupted. The mechanism these systems use to initiate the alert that tower lights are not operational is triggered when a break in the electrical current to one or more beacons or incandescent lights is detected. The break in the electrical current initiates a telephone message to the centralized monitoring control unit.

In preparing for this meeting, PCIA worked closely with a task force from the Site Owners and Managers Alliance (SOMA) -- the PCIA membership section whose members includes independent tower companies who manage and operate multi-use antenna structures -- many of which are the tall structures subject to the FCC's marking and lighting requirements. As noted above, SOMA companies as well as other PCIA members (such as PCS carriers who also operate large portfolios of antenna structures -- although the great majority of towers operated by PCS carriers are not subject to the marking and lighting requirements) and other FCC-licensed communications carriers are highly confident that their tower lighting and monitoring systems are not in imminent risk of being disabled by Y2K. At the same time, wireless companies recognize that the coming of the millennium could bring unanticipated surprises. As such, PCIA and its members want to be sure that the wireless industry takes all reasonable precautions to prevent outages and other incidents that could jeopardize air traffic safety.

Given the serious consequences if Y2K issues were to disable either lights or remote monitoring systems, PCIA appreciates FCC's leadership in prompting a thorough evaluation of this issue and will be pleased to disseminate to the wireless industry any findings, guidance, and insight that flow from this meeting.

## **The Personal Communications Industry Association (PCIA)**

PCIA is a broadbased, international trade association that represents companies that provide wireless communications services, including personal communications services (PCS), paging and messaging services, fixed broadband wireless services, commercial dispatch services, as well as companies that operate private or corporate wireless systems. PCIA's membership also includes manufacturers of wireless equipment and the Site Owners and Managers Alliance (SOMA), which represents tower and antenna site management companies. PCIA produces one of the preeminent tradeshows and educational events in the wireless industry, the Personal Communications Showcase. PCIA is also an FCC-certified frequency coordinator for the business radio and other private radio services. PCIA's charitable foundations and activities include LifePage, LifeReach, and other programs that employ wireless technologies to provide life-saving services to the needy.

### **Sheldon Moss**

Sheldon Moss is manager of government relations for wireless infrastructure issues with the Personal Communications Industry Association (PCIA). He coordinates the association's efforts on behalf of wireless carriers and antenna site managers on public policy matters involving antenna siting, land-use planning, workplace safety for antenna facilities, radiofrequency (RF) regulation compliance, and other facilities management issues. He also manages the elected leadership council of the PCIA Site Owners and Managers Alliance (SOMA).

Before joining PCIA, he worked in government relations with the American Feed Industry Association (AFIA) where he managed association advocacy efforts on animal health, livestock production, and veterinary pharmaceutical issues. Previously, he managed a diversified cattle and crop operation in Virginia's Shenandoah Valley and worked on cattle and horse ranches in a number of western states.

He has a bachelor's degree from Montana State University in Agricultural Production/Animal Science and an MBA from Strayer College.